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January 23, 2003

Via Hand-Delivery

Ms. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

Re: Complaint of Michael Van Wies Against CenturyTel of Ooltewah-Collegedale, Inc., TRA Docket No. 02-00058

Dear Chairman Kyle:

Pursuant to the January 9, 2003 Order Establishing Revised Procedural Schedule, enclosed is the original and 13 copies of the Rebuttal Testimony of Terry Crutchfield for filing in the above-referenced docket. Also enclosed is an additional copy, which I would appreciate your stamping as "filed," and returning to me by way of our courier.

Should you have any questions with respect to this filing, please do not hesitate to contact me.

Sincerely,



Ross I. Booher

Enclosures

cc: Jonathan Wike, Esq. (via facsimile)
Mr. Michael Van Wies (via facsimile)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**COMPLAINT OF MICHAEL VAN WIES
AGAINST CENTURYTEL OF
OOLTEWAH-COLLEGEDALE, INC.**

Docket No. 02-00058

REBUTTAL TESTIMONY

OF

TERRY CRUTCHFIELD

on behalf of

CenturyTel of Ooltewah-Collegedale, Inc.

Rebuttal Testimony of Terry Crutchfield

1. **Q. Please re-state your full name and business address.**
A: Terry Crutchfield
P.O. Box 782
Ooltewah, TN 37363

2. **Q. Mr. Russell has stated that CenturyTel's switch data "could be" only about thirty-six pages per year. Approximately how many pages of printed data was produced on a monthly basis by CenturyTel's DMS-100 switch as it was programmed in January to October 2001?**
A: Approximately 30,000 pages of reports and information were printed out monthly. In addition to hourly and daily trunk reports for 92 trunk groups, all other switch information and reports were also being printed. Line reports, PM reports, Front End and Network reports and any report or alarm generated by the DMS100 switch were being printed.

3. **Q. Mr. Russell has stated that the "most common cause" of "problems placing calls to phone numbers outside [a caller's] local exchange lines served by BellSouth" "would be problems with the outgoing trunks." Do you agree?**
A: No. Mr. Russell's conclusion can only be based on speculation. To determine the cause of a call problem, it is usually necessary to consider all the facts surrounding the caller's attempted call(s) as well as other evidence that supports or refutes various possible explanations for the claimed problem. As discussed in my direct testimony, there are many reasons, other than problems with the Chattanooga trunk groups or CenturyTel service or facilities, why a caller's call might not be successfully completed. In this case, the evidence shows that Mr. Van Wies' complaints are not attributable to the Chattanooga trunk groups.

4. **Q. To your knowledge, has CenturyTel ever "changed the routing of overflow calls" or otherwise prevented calls from overflowing or from entering the Chattanooga tandem to conceal line or service problems from BellSouth surveillance or anyone else?**
A. Of course not.

5. **Q. To your knowledge, has CenturyTel every submitted false or inaccurate reports to the TRA to conceal equipment failures or service problems.**
- A.** Of course not.
6. **Q. Mr. Van Wies has complained of call blockage problems in the Third Quarter of 2001. Has CenturyTel added trunk groups or otherwise increased the capacity of the Chattanooga trunk groups since the Second Quarter of 2001?**
- A.** No. It has not been necessary to increase the call capacity on the Chattanooga trunk groups because the current capacity is fully sufficient as indicated by the trunk data contained in Hale Exhibits 1 and 2 and Nipper Exhibit 1.
7. **Q. Has CenturyTel's call traffic volume increased, decreased or stayed the same since the Third Quarter of 2001?**
- A.** CenturyTel's Ooltewah call volumes, including on the Chattanooga trunk groups, have increased since the Third Quarter of 2001.
8. **Q. What is the significance of the facts that CenturyTel's data shows a call completion of 99% or higher on the Chattanooga trunk groups since October 2001, that no new trunk groups have been added since at least the Second Quarter of 2001 and call volume has increased since at least the Third Quarter of 2001?**
- A.** These facts are significant because they further confirm that CenturyTel was not experiencing call blockage problems on the Chattanooga trunk groups during the Third Quarter of 2001 as Mr. Van Wies has alleged. If the Chattanooga trunk groups lacked capacity in the Third Quarter of 2001 and the call volume has increased since that time and yet no additional call capacity has been added, then the call completion data from October 2001 through 2002 would be expected to show continued and increasing call blockage problems, not to mention increased customer complaints. Instead, the data shows that the Chattanooga trunk groups are achieving a call completion rate of 99% or better and no one has complained of call blockage problems except for Mr. Van Wies.
9. **Q. Mr. Russell claims that the Nortel DMS 100 Central Switch would "normally" maintain in the Switch on a hard disk for 12 months the "service and in particular Trunk usage data" information. Is this claim accurate?**
- A.** No. It is true that the Nortel DMS 100 switch does contain a hard drive in addition to an external storage device. The switch in Ooltewah has a 15k capacity for storage. Nortel refers to this as Disk Log or DLOG. The DLOG is set up to erase old files in order to write new files. This capacity allows CenturyTel to maintain approximately one month of data on the DLOG. The Nortel manual

suggests that you maintain 2 weeks of data on the DLOG. Therefore, CenturyTel's DLOG storage capacity exceeds what is suggested by Nortel.

10. **Q.** The opinions Mr. Russell expresses in his pre-filed testimony are based, in part, on the premise that Mr. Van Wies has had "problems placing calls to phone numbers outside [his] local exchange to lines served by BellSouth." What evidence do you have, if any, about the reliability or accuracy of this premise.

A. Mr. Van Wies repeatedly called me before and after he moved to Ooltewah asking that CenturyTel hire him. Every time Mr. Van Wies inquired about hiring him, I explained to him that CenturyTel had no vacancy for him but that he was welcome to fill out an application for future employment, but he did not. Mr. Van Wies warned me on several occasions that if CenturyTel did not hire him, we would "regret it."

When Mr. Van Wies finally acknowledged that CenturyTel would not be hiring him, he warned me to expect "lots of problems," that "he would see about that" and that CenturyTel "would be sorry," or words to that effect. Shortly thereafter, Mr. Van Wies began regularly filing complaints against CenturyTel that have no doubt made him known by many at CenturyTel, the TRA, the FCC and other government agencies. . CenturyTel has investigated all of Mr. Van Wies' numerous complaints, sometimes with a TRA representative along, and each time his complaints have been found to be baseless.

11. **Q.** Mr. Russell states in his pre-filed testimony that CenturyTel could "change the routing of overflow calls to prevent the far end from seeing the problem.... [t]he only way this could be revealed is to produce the raw data." Is this statement accurate?

A. No. If CenturyTel changed the routing of overflow calls this could be revealed in more than one way. For example, many customers would complain since such action would affect all re-routed calls, not just Mr. Van Wies' calls. BellSouth's data would also indicate an absence of call traffic originating from Ooltewah. Nipper Exhibit 1, however, shows that BellSouth was receiving call traffic from Ooltewah on the overflow trunk groups.

12. **Q.** Does this conclude your pre-filed rebuttal testimony?

A. Yes.